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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
Plaintiff,)	
vs.)	Case No. 4:14CR00187 JAR (DDN)
PAMELA TABATT, et. al.,)	
Defendants.)	

JOINT REQUEST FOR EXTENSION OF TIME TO FILE MOTION TO DISMISS INDICTMENT

COME NOW Defendants, by and through undersigned counsel, and hereby request a 30-day extension of time, or until Wednesday, July 1, 2015, to file a Joint Motion to Dismiss Indictment With Evidence in Support. In support of said request, Defendants hereby state as follows:

- 1) As this Court is undoubtedly aware, a June 1, 2015 deadline had been set for the filing of Joint Motion to Dismiss Indictment. *See* Order Concerning Pretrial Motions to Dismiss, Page 1, on file with this Court.
- 2) In accordance with the aforementioned Order, Counsel for all Defendants have coordinated their efforts to research, draft and otherwise prepare a motion to dismiss, to the extent the same have similar legal issues (e.g. same analogues analysis, etc.). Given the unorthodox nature of this matter, as well as the multitude of analogues listed in the indictment, Defendants collectively request additional time to complete the joint motion to dismiss and submit the same in a competent manner. Counsel believe additional review of applicable discovery materials, in addition to a comprehensive review of recent case law (now in existence and perhaps imminent via McFadden) regarding similar matters is necessary. Simply stated, the Defendants now agree that this request is necessary so that one, cogent motion outlining the proposed legal and factual bases can be filed

with this Court; and that Counsel do not now possess all information necessary to complete the motion by the June 1, 2015 deadline.

WHEREFORE, for the foregoing reasons, Defendants request this Court grants their joint request for a 30-day extension of time, or until July 1, 2015, to file the joint motion to dismiss and for any and further relief this Court finds just and prudent under the circumstances.

THE LAW OFFICES OF JOHN M. LYNCH, LLC.

E/S John M. Lynch
John M. Lynch
7777 Bonhomme Avenue, Suite 1200
Clayton, MO 63105
(314) 726-9999
(314) 726-9199 Facsimile
ilvnch@lynchlawonline.com

Attorneys for Pamela Tabatt

LENNY KAGAN, ATTORNEY AT LAW

E/S Lenny Kagan
Lenny Kagan
7911 Forsyth Boulevard, Suite 300
Clayton, MO 63105
(314) 919-9990
(314) 862-5335 Facsimile
lkagan@hotmail.com

Attorneys for Richard Gross

THE LAW OFFICES OF J. CHRISTIAN GOEKE

E/S J. Christian Goeke Susan Kister 7711 Bonhomme Avenue, Suite 850 Clayton, MO 63105 (314) 862-5110 (314) 862-5943 chris@jcgoekelaw.com

Attorney for Paul Berra, Jr.

Certificate of Service

I hereby certify that on May 27, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

James Delworth
Jennifer Winfield
Erin Granger
Assistant United States Attorneys
Thomas F. Eagleton Courthouse, 20th Floor
111 South Tenth Street
St. Louis, Missouri 63102

e/s John M. Lynch